

April 24, 2015

National Credit Union Administration
Gerald Poliquin, Secretary of the Board
1775 Duke Street
Alexandria, VA 22314-3428

RE: Comments on Proposed Rule 791 and IRPS 15-1

Dear Gerald Poliquin,

I am writing on behalf of Valley Oak Credit Union, which serves Tulare and Madera County, California. We have 6,700 Members and \$48 Million in assets. Valley Oak appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed amendments to the small entity definition.

Valley Oak supports NCUA's proposal to increase the threshold for small entity to \$100 million. These are still small institutions and the cost of compliance for this size institution is driving many of them out of business. Plus this change allows credit unions under \$50 million to grow without fear of extra regulatory burden.

While we support the proposed rule we would like to suggest a higher threshold. Banks make the distinction at \$550 million. Credit unions may not want to make the exact same distinction however it would probably make sense to at least look at \$250 million and down as a small entity.

OSCU may need additional resources to provide services to all credit unions if the small entity level is changed. This would be money well spent by the NCUA as it would really help bolster the small credit unions. Small credit unions are the ones going away the fastest. If we want to preserve small credit unions this is a great step in that direction.

Increasing the small credit union threshold makes sense. If NCUA is really trying to help the small credit unions survive this change is a very positive first step. We have lost far too many small credit unions already due to regulatory compliance costs.

Thank you for the opportunity to comment on this Proposed Rule and for considering our views on the proposed amendment.

Sincerely,

Alan Cortum
President/CEO
Valley Oak CU

cc: CUNA, CCUL